

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

BRUCE FERRINI,	)	CASE NO. 5:02 CV 2437
	)	
	)	
Plaintiff,	)	
	)	MAGISTRATE JUDGE
v.	)	GEORGE J. LIMBERT
	)	
JAMES E. FERRELL, <i>et al.</i>	)	
	)	
Defendants/Third-Party	)	
Plaintiffs,	)	
	)	
FERRINI RARE BOOKS OF AKRON,	)	
<i>et al.</i> ,	)	
	)	
Third-Party Defendants.	)	
	)	
STATE OF OHIO	)	SS. SUPPLEMENTAL AFFIDAVIT
COUNTY OF CUYAHOGA	)	OF LINDSAY P. JONES

LINDSAY P. JONES, being first duly sworn, deposes and states:

1. I am a paralegal employed at the law firm of Taft, Stettinius & Hollister LLP in Cleveland, Ohio, and this affidavit is made from personal knowledge, and supplements the affidavit I submitted in support of Third-Party Plaintiffs' Motion for Prosecution of Criminal Contempt (ECF Dkt. 199, Exhibit A.)
2. On October 29, 2004, the Court, the Court issued an order (ECF Dkt. #172) granting Third-Party Plaintiffs' Motion to Show Cause (the "Contempt Order"). The Contempt Order enjoined Mr. van Rijn from publishing his website at its then-current location ([www.michelvanrijn.com](http://www.michelvanrijn.com)) or at any subsequent internet address, in any form whatsoever, unless

and until he removes all references, articles and links referring to the individuals identified in Paragraph 6(a) of the Settlement Agreement (ECF Dkt. #172 at 26).

3. From approximately July 8, 2004 until the *micheelvanrijn.com* website address was disabled, Mr. van Rijn published, on a continual basis, material violating Paragraph 6(a) of the Settlement Agreement, as more fully detailed in the evidence admitted at the October 22, 2004 hearing on Third-Party Plaintiffs' Motion for Contempt. I testified and presented evidence regarding these numerous violations at that hearing.

4. On or about November 1, 2004, after being notified about the Contempt Order, the registrar of the domain address for the *micheelvanrijn.com* website took steps to disable the *micheelvanrijn.com* website, and that website address remains disabled today.

5. On or about November 4, 2004, without first removing material prohibited by the Court's orders, and in violation of the Settlement Agreement and the Contempt Order, Mr. van Rijn transferred much of the contents from his *micheelvanrijn.com* website address to another website address, *www.micheelvanrijn.nl* (the "*micheelvanrijn.nl* website").

6. Beginning on November 4, 2004 and continuing through today's date, I have been monitoring the *micheelvanrijn.nl* website for articles which relate to Mr. Ferrell and the other persons, entities and items identified in Paragraph 6(a) of the Settlement Agreement.

7. As mentioned in Third-Party Plaintiffs' three status reports regarding compliance with the October 29, 2004 Order (ECF Dkt. #s 174, 189, 201), and in the Affidavit I supplied in support of Third-Party Plaintiffs' Motion for Prosecution of Criminal Contempt (ECF Dkt. #199, Exhibit A) from November 4, 2004 to the date of this affidavit, Mr. van Rijn has continually posted articles on his website which relate to Mr. Ferrell and the other persons, entities and items

identified in Paragraph 6(a) of the Settlement Agreement, thereby violating, on a continuing and daily basis, both the Settlement Agreement and the Contempt Order.

8. Publication of the website *itself* is prohibited by the October 29, 2004 Contempt Order (ECF Dkt. #172 at 26). Notwithstanding that order, Mr. Van Rijn has not only continued to publish his website, but since the Contempt Order was issued, Mr. van Rijn has published daily on the *micheelvanrijn.nl* website literally hundreds of new references to persons, entities and items identified in Paragraph 6(a) of the Settlement Agreement.

9. Subsequent to the filing of Third-Party Plaintiffs' Motion for Prosecution of Criminal Contempt, Mr. van Rijn has published numerous articles which violate this Court's Orders, including the following:

- (a) On April 13, 2005, Mr. van Rijn re-posted his series of articles entitled "Pipeline to Justice, Parts I-V," which he originally posted on the *micheelvanrijn.com* website beginning March 10, 2003. In these articles Mr. van Rijn details his "fighting American gas billionaire James E. Ferrell in an American Court..." The post also contains a link to a court document that was sealed by Court order. See ECF Dkt. #24, ECF Dkt. #156.
- (b) On April 19, 2005, Mr. van Rijn posted an article entitled "The Unofficial X-rated MvR Home Page" in which he described his website as "such a small website and such big guns out there to silence me," with continued references to Mr. Ferrell. He also stated "Please indict James E. Ferrell."
- (c) On April 26, 2005, Mr. van Rijn posted under "MvR-Tidbits," a "potpourri" of e-mails which Mr. van Rijn asserts were written by Mr. Ferrell.
- (d) On May 3, 2005, Mr. van Rijn posted an article entitled "James Ferrell Trampling Through the Tulips," in which he stated that "Acting for James Ferrell, a Dutch law firm has now issued me with a warning that they will try to close my website down."
- (e) On May 7, 2005, Mr. van Rijn posted an article regarding Ed and Sam Merrin, New York art dealers, in which he made an impermissible reference to Michael Bennett. Also on that date, Mr. van Rijn added a link to his "Pipeline to Justice" "sidebar" in which he posted a new link to his

2002 articles defaming Mr. Ferrell and other people identified in Paragraph 6(a) of the Settlement Agreement.

- (f) On May 19, 2005, under "MvR-TidBits," Mr. van Rijn posted an article entitled "The One-Armed Bandit at the Cleveland Museum of Art" in which he made a prohibited reference to Katharine Lee Reid.
- (g) On May 21, 2005, Mr. van Rijn posted at the top of his website ("MvR's Wire") a scrolling banner falsely stating "Ferrellgas Under Grand Jury Investigation..." This banner ran from May 21, 2005 to May 30, 2005 and then resumed again from June 13, 2005 to July 12, 2005.
- (h) On May 27, 2005, Mr. van Rijn posted an article entitled "The Untouchable: Looted Antiquities Network Continues to Prosper" in which he falsely accused Mr. Ferrell of smuggling. Mr. van Rijn also provided a link to a power point presentation regarding the purported "Ferrell Network."
- (i) On June 1, 2005, Mr. van Rijn posted an update in which he claimed a victory in the Swiss courts regarding the criminal charges brought against him by the Aboutaam brothers and falsely asserted that Mr. Ferrell conspired to have the Swiss extortion charges filed.
- (j) On June 13, 2005, under "MvR-TidBits," Mr. van Rijn posted an article referring to Mr. Ferrell as a "terrorist-funding demon."
- (k) On June 16, 2005, Mr. van Rijn posted a photograph of Mr. Ferrell with "jug ears" and made reference to "the illicit Jug-Eared Ferrell Collection".
- (l) On June 26, 2005, Mr. van Rijn's lead article was "Breaking the Big Story, James E. Ferrell exposed on Aljazeera". This included multiple links to an article posted on *Aljazeera.net* dated June 19, 2005. The article, using Mr. van Rijn as its primary source, claimed that Mr. Ferrell runs a London-based business that deals in smuggled relics. On June 28, 2005, June 29, 2005, June 30, 2005 and July 5, 2005, Mr. van Rijn repeatedly posted numerous reprints of the June 19, 2005 *Aljazeera.net* articles. (Shortly after its publication, and after being notified of its false content, *Aljazeera.net* withdrew the article from its website. Mr. van Rijn nevertheless retained his "re-publication" of the defamatory article on his website.)
- (m) On July 7, 2005 Mr. van Rijn posted an article entitled "Ink and Blood on the Carpet Part I" in which he refers to "GasssFinger James 'Aljazeera' Ferrell."
- (n) On July 11, 2005, Mr. van Rijn posted an article entitled "Ink and Blood on the Carpet Part II" in which he stated "watch me (MvR) in four easy

stages tie James E. 'Hezbollah Friendly' Ferrell to the London bombings..."

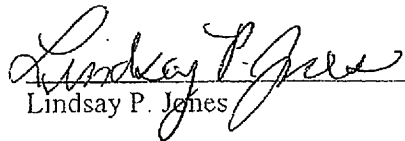
- (o) On July 13, 2005, Mr. van Rijn posted a copy of a *KansasCity.com* article regarding Mr. Ferrell's designation as Regional Entrepreneur of the Year, and also posted a photograph of Mr. Ferrell which Mr. van Rijn altered to add a kaffiyeh on Mr. Ferrell's head.
- (p) On July 18, 2005, Mr. van Rijn posted additional reprints of the June 19, 2005 *Aljazeera.net* article.
- (q) On July 28, 2005, Mr. van Rijn posted an article entitled "Les Quatre Cents Coups" in which he added an additional link to his previous "Pipeline to Justice" articles.
- (r) On July 29, 2005, under "World-Breaking News in Holland's Leading Broadsheet", Mr. van Rijn posted a link to the English translation of a Het Parool newspaper article "Dead Sea Scrolls in the Trade". This article, relying upon van Rijn as a source, falsely asserted "Ferrell considers the looted sacred Jewish manuscripts a sound investment, and tries to turn them over quickly at a profit".
- (s) On August 11, 2005, Mr. van Rijn posted a copy of an article appearing in DeMorgen, a Belgian newspaper entitled "Financing Terrorism with Art". Mr. van Rijn is quoted extensively and at one point stated "Ferrell is, of course, also one of the principal buyers of looted top artworks from Lebanon and other Middle East countries."
- (t) On September 29, 2005, Mr. van Rijn posted a link to a blog site with references to Mr. Ferrell and his designation by the University of Missouri as its Regional Entrepreneur of the Year. Mr. van Rijn takes note of the blog and states, "The Ferrell case is substantiated by self incriminating tape recording of Ferrell meeting with the culprits, Ferrell's e-mails as well as independent corroboration by various of the participants. Part of this evidence can be accessed on my website."
- (u) On October 10, 2005, Mr. van Rijn posted a link to the English translation of Henk Schutten's HetParool newspaper article "Dead-Sea Scrolls in Clearance Sale." This article contains a substantial amount of misinformation concerning Mr. Ferrell and his acquisition of Dead Sea Scroll fragments.
- (v) On October 17, 2005, Mr. van Rijn posted an article entitled "This Year's Hezbollah Award Goes to..." in which he asks why the University of Missouri designated Mr. Ferrell "Entrepreneur of the Year." "Is it for payments for looted and smuggled treasure to Baalbek. Lebanon after 9/11? Is it for his contacts with Hezbollah-frontman Abbas Yaghi? Or is

it because Ferrell bought looted manuscripts that were part of the Dead Sea Scroll?"

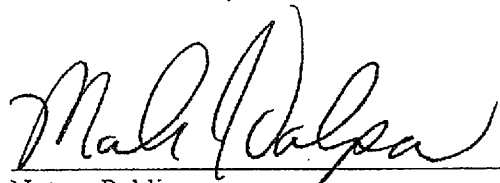
- (w) On October 24, 2005, Mr. van Rijn posted an article entitled "How to buy an honor from your local college" in which he referred to Mr. Ferrell as the "notorious loot-collector."
- (x) On November 2, 2005, Mr. van Rijn posted an article entitled "Curse of the Essenes in the Promised Land" in which he made prohibited references to Mr. Ferrell.
- (y) On November 3, 2005, Mr. van Rijn posted an article entitled "The Oldest Hebrew Manuscript in the World" in which he referred to "looted art collector James E. Ferrell."
- (z) On November 10, 2005, Mr. van Rijn posted an article from LaClave.com entitled "From Gallery owner to informer". This article contained prohibited references to Mr. Ferrell.

10. As of November 22, 2005, all of the aforementioned prohibited articles, references, and links and references remain on the *micheelvanrijn.nl* website.

FURTHER AFFIANT SAYETH NAUGHT.

  
Lindsay P. Jones

Sworn to before me and subscribed in my presence this 22<sup>nd</sup> day of November, 2005.

  
Notary Public

MARK JUDE VALBONI, Attorney  
NOTARY PUBLIC  
My commission expires 11/22/2008  
Sec. 59-2-2, N.C.